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9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) NO. CR 07-0337 MHP
14 Plaintiff,)
15 v.)
16 JACQUELINE FROELICH-L'HEUREAUX,)
17 Defendant.)
18 _____)

19 The United States of America, by and through its attorney Assistant United States
20 Attorney Kyle F. Waldinger, and the defendant Jacqueline Froehlich-L'Heureaux, by and through
21 her attorney Leland B. Altschuler, hereby stipulate and agree that the Plea Agreement in this
22 matter may be unsealed. In further support of this request, the parties state as follows:

23 1. The defendant entered her plea of guilty in open Court on June 4, 2007. At that
24 time, the Court ordered that the parties' Plea Agreement be filed under seal.

25 2. Since that time, the United States has obtained an Indictment charging the
26 defendants David Nosal and Becky Christian with numerous offenses. That case is numbered
27 CR 08-0237 MHP. Both Nosal and Christian have made their initial appearances before
28 Magistrate Judge Larson, and Christian has made her initial appearance before this Court. Both
defendants are scheduled to appear before this Court on May 19, 2008.

STIPULATION AND [PROPOSED] ORDER
CR 07-0337 MHP

1 3. Both Nosal and Christian have requested Rule 16 discovery from the government.
2 The government intends to produce in discovery the defendant Jacqueline Froehlich-
3 L'Heureaux's Plea Agreement to the defendants Nosal and Christian. Before doing so, the
4 United States seeks unseal that agreement.

5 4. Accordingly, for the reasons stated above, the parties stipulate and agree that the
6 defendant Jacqueline Froehlich-L'Heureaux's Plea Agreement with the United States should be
7 unsealed.

8 SO STIPULATED.

9 DATED: May 6, 2008

BRIAN J. STRETCH
Acting United States Attorney

15 DATED: May 5, 2008

/s/
12 KYLE F. WALDINGER
Assistant United States Attorney
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/s/
16 LELAND B. ALTSCHULER
Attorney for defendant Jacqueline Froehlich-
L'Heureaux
17

18 [PROPOSED] ORDER

19 Good cause appearing therefor, it is hereby ordered that the plea agreement filed in this
20 matter on or about June 4, 2007 is UNSEALED.

21 DATED: May __, 2008

22 _____
23 MARILYN HALL PATEL
UNITED STATES DISTRICT JUDGE
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STIPULATION AND [PROPOSED] ORDER
CR 07-0337 MHP